

Temporary Protection Portugal

This annex on temporary protection complements and should be read together with the [AIDA Country Report on Portugal](#).

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Temporary Protection Procedure

A. General

The Temporary Protection Directive (TPD)¹ has been **transposed** to the national legal order by Act no.67/2003, of 23 August 2003 (Temporary Protection Act).²

According to national law, temporary protection can be **activated** following a decision of the Council of the EU, or by decision of the national Government, with due regard for the risks to displaced persons, the need and urgency of the provision of temporary protection, and the consequences for public order and national security.³

When a mass influx of displaced persons is predictable, the Government must create an **Interministerial Commission**, presided by the Ministry of Home Affairs.⁴ This Commission is responsible for, inter alia, assessing reception capacity, defining the reception conditions and their provision, and coordinating the application of temporary protection.⁵

While the **personal scope of application** of temporary protection must be defined by decision of the Council of the EU/national Government, the Temporary Protection Act provides for the **exclusion** of certain persons.⁶ These include:

- ❖ Persons with regard to whom there are *strong reasons*⁷ to consider that they:
 - Have committed a crime against peace, a war crime or a crime against humanity, as defined in *national legislation* and in the relevant international law instruments to which Portugal is a party;⁸
 - Have committed a serious non-political crime⁹ outside national territory before they could have been admitted in Portugal as beneficiaries of temporary protection.¹⁰ Within this context, the severity of the criminal procedure must be proportionate to the nature of the infraction. Particularly cruel or inhuman actions may be deemed as non-political crimes even if allegedly committed with a political purpose;¹¹
 - Have committed acts contrary to the objectives and principles of the United Nations.¹²
- ❖ Persons with regard to whom there are serious reasons to be considered dangerous to the national security, or that were sentenced by a final judgement for a serious non-political crime or are a *serious*¹³ threat to the national community.¹⁴

The application of the exclusion clauses must be based on the individual behaviour of the person and be proportionate.¹⁵ Exclusion is applicable to both direct participants in the crimes and instigators.¹⁶

¹ Council Directive 2001/55/EC of 20 July 2001 on minimum standards for giving temporary protection in the event of a mass influx of displaced persons and on measures promoting a balance of efforts between Member States in receiving such persons and bearing the consequences thereof, available at: <https://bit.ly/3kl5SRz>.

² Available at: <https://bit.ly/3JhiysX>.

³ Article 4(1) and (3) Temporary Protection Act.

⁴ Article 4(2) Temporary Protection Act.

⁵ Article 5 Temporary Protection Act. In 2022, such Commission was created by the Resolution of the Council of Ministers no.29-D/2022, of 11 March 2022, par.15.

⁶ Article 6 Temporary Protection Act.

⁷ The corresponding Directive provision (article 28(1)(a)) refers to “serious reasons”(in Portuguese, “fortes razões”/“razões sérias”).

⁸ Article 6(1)(a)(i) Temporary Protection Act.

⁹ Crime punishable with a prison term of more than 3 years (article 6(5) Temporary Protection Act). This criterion is not contained in the directive’s text (article 28(1)(a)(ii)).

¹⁰ Article 6(1)(a)(ii) Temporary Protection Act.

¹¹ Article 6(3) Temporary Protection Act.

¹² Article 6(1)(a)(iii) Temporary Protection Act.

¹³ The qualification of the threat to national community as serious, is not included in the Directive’s corresponding provision.

¹⁴ Article 6(1)(b) Temporary Protection Act.

¹⁵ Article 6(2) Temporary Protection Act.

¹⁶ Article 6(4) Temporary Protection Act.

The issuance of exclusion decisions is adopted by the Ministry of Home Affairs, following a reasoned opinion by SEF,¹⁷ and may be appealed before the administrative courts.¹⁸ In the absence of specific deadlines and procedures, the general rules on administrative appeals apply.¹⁹

Temporary protection had never been activated in Portugal before March 2022, neither by Council decision, nor by decision of the national Government.

On 1 March 2022, the Council of Ministers approved a Resolution establishing the criteria for granting of temporary protection for displaced people from Ukraine.²⁰ It has been subsequently amended on 11 March and 22 December 2022, mostly changing the personal scope of temporary protection (see: [Qualification](#)). The relevant Resolutions of the Council of Ministers also determined, inter alia, that:

- ❖ *Applications* for temporary protection could be made in person or digitally, inside or outside Portuguese territory;²¹
- ❖ *Applications* for temporary protection are to be immediately referred to the relevant authorities for the issuance of national healthcare system number, tax number, and social security number;²²
- ❖ Employment registration with the relevant national authority is automatic;²³
- ❖ Accommodation and subsistence allowances are to be granted to beneficiaries that do not have sufficient financial resources;²⁴
- ❖ Access to social security by beneficiaries of temporary protection is processed under the rules applicable to refugees.²⁵

In addition to an online platform for registration for temporary protection (see: [Registration](#)),²⁶ the national authorities created a website gathering information on the national response to displacement from Ukraine. The website allows to request and offer help, and its contents are available in Portuguese, English, and Ukrainian.²⁷

According to the information provided by SEF, temporary protection cases are analysed by a total of 12 staff members of its regional directorates.

According to the information provided by SEF, in the course of 2022, 56,599 persons requested registration for temporary protection to the Portuguese authorities.²⁸ Out of these, 44,524 were Ukrainian nationals, and 12,075 third country nationals that lived in Ukraine.²⁹ By the end of the year, there were 45,613 beneficiaries of temporary protection registered in the country. SEF has also reported that 1,535 statuses were cancelled during the year.

¹⁷ Article 6(6) Temporary Protection Act.

¹⁸ Articles 6(7) and 28 Temporary Protection Act.

¹⁹ General rules provided in the Administrative Procedure Code – CPA - (available at: <https://bit.ly/3mV8Ymn>), and in the Code of Procedure in Administrative Courts – CPTA - (available at: <https://bit.ly/3ToXKmo>). Notably, article 58(1)(b) CPTA provides for a general deadline for appeal of 3 months.

²⁰ Resolution of the Council of Ministers no.29-A/2022, of March 2022, available at: <https://bit.ly/3vRYoie>.

²¹ Resolution of the Council of Ministers no.29-A/2022, of 1 March 2022, last amended by Resolution of the Council of Ministers no.135/2022, of 28 December 2022, par.7, available at: <https://bit.ly/3HWIUjU>.

²² Ibid, par.8.

²³ Ibid, par.9.

²⁴ Ibid, par.12.

²⁵ Ibid, par.13.

²⁶ SEF for Ukraine: <https://bit.ly/3HRgzuf>.

²⁷ Portugal for Ukraine: <https://bit.ly/3RwtZ27>.

²⁸ 23.480 Men, 33.119 Women; 13.961 Children, of which 752 unaccompanied.

²⁹ Out of which, 645 were Russian nationals.

B. Qualification for temporary protection

The personal scope of temporary protection has evolved throughout the year. On 1 March 2022, the Council of Ministers approved a Resolution³⁰ that granted temporary protection, with automatic grant of a residence permit, for one year (extendable), to:

- ❖ Ukrainian nationals and their family members coming from Ukraine that could not return to the country due to the war;
- ❖ Non-Ukrainians that prove being related,³¹ married or in a civil partnership to Ukrainian nationals coming from Ukraine that could not return to the country due to the war.

Said Resolution was amended on 11 March, widening the personal scope of application of the temporary protection regime, and bringing it in line with the subsequent Council decision.³² The following persons became entitled to temporary protection:

- ❖ Ukrainian nationals and beneficiaries of international protection in Ukraine, coming from Ukraine, and that cannot return due to the war;
- ❖ Other third country nationals or stateless persons that are in the same conditions as those above and that can prove either that they are related to the persons referred to above, **or** that they were permanent residents in Ukraine/had a temporary residence permit in the country/had a long-term visa in order to obtain such a permit and whose durable return to their country of origin is not possible.

In December 2022, the personal scope of temporary protection in Portugal was once again redefined, this time restricting eligibility. Since then, the following persons are eligible for temporary protection:³³

- ❖ Ukrainian nationals and beneficiaries of international protection in Ukraine, coming from Ukraine, and that cannot return due to the war;³⁴
- ❖ Third country nationals and stateless persons that prove being family members of those referred to above **or** that prove being permanent residents in Ukraine, and whose safe and lasting return to the country of nationality is not possible.³⁵

As such, at the time of writing, third country nationals and stateless persons who were not beneficiaries of international protection in Ukraine are only eligible if they are family members of a Ukrainian national/beneficiary of international protection in Ukraine, or if they were permanent residents in the country and cannot return to their country of origin in a safe and lasting manner.

According to the information provided by SEF to the AIDA report, third country nationals/stateless persons that were granted temporary protection under the prior rules will continue to benefit from temporary protection.

The amended Resolution defines family members as:³⁶

- ❖ Spouses or unmarried partners in a sustainable relationship, i.e., at least 2 years of living together in conditions analogous to marriage;

³⁰ Resolution of the Council of Ministers no.29-A/2022, of 1 March 2022, available at: <https://bit.ly/3vRYoie>.

³¹ It is unclear why the resolution refers to family members twice, given that, if such family members were Ukrainian, they would be already directly included in the personal scope of temporary protection.

³² Resolution of the Council of Ministers no.29-D/2022, of 11 March 2022, available at: <https://bit.ly/3tlPx7b>. See also Council Implementing Decision (EU) 2022/382 of 4 March 2022 establishing the existence of a mass influx of displaced persons from Ukraine within the meaning of Article 5 of Directive 2001/55/EC, and having the effect of introducing temporary protection, available at: <https://bit.ly/3X7rlB6>.

³³ Resolution of the Council of Ministers no.135/2022, of 28 December 2022, available at: <https://bit.ly/3HTIWbf>. The fully amended text is available at: <https://bit.ly/3l9Xx9l>.

³⁴ Ibid., par.1.

³⁵ Ibid, par.2.

³⁶ Ibid, par.3.

- ❖ Children under 18 years old (of the Ukrainian national/beneficiary of international protection in Ukraine or of their spouse or partner);
- ❖ Other close relatives sharing a household, that are fully or significantly dependent on the Ukrainian national or beneficiary of international protection in Ukraine entitled to temporary protection.

According to the publicly available information, reiterated by SEF, family links can be proved by any available means, including witnesses.³⁷

According to the information provided by SEF, in practice, persons who have left Ukraine since 1 January 2022 are eligible for temporary protection. It is unclear what is the legal basis for this cut-off date, given the wording of the relevant legislation. It was not possible to confirm this information in any of the public source available at the time of writing.

According to the information provided by SEF, in the course of 2022, 56,599 persons requested registration for temporary protection to the Portuguese authorities.³⁸ Out of these, 44,524 were Ukrainian nationals, and 12,075 third country nationals that lived in Ukraine.³⁹ By the end of the year, there were 45,613 beneficiaries of temporary protection registered in the country. However, SEF informed that it is not possible to provide a breakdown of beneficiaries of temporary protection on the basis of entitlement.

SEF confirmed that persons whose registration for temporary protection is refused are not issued a written decision, nor informed of the right to appeal on a systematic basis. According to the same authority, data on such refusals is not available.

C. Access to temporary protection and registration

1. Admission to territory

CPR is not aware of instances of refusal of entry at the border of people fleeing Ukraine or of difficulties impacting re-entry of people who have returned to Ukraine.

Following the TPD, the Temporary Protection Act determines that, if needed, and taking into account the urgency of the situation, the issuance of visas may be fast-tracked and simplified. This is done namely by shortening the deadlines applicable to necessary actions, and by supressing others.⁴⁰ Such visas are to be issued free of charge.⁴¹

On 25 February 2022, the Prime-Minister announced that Portuguese Embassies and Consulates had been given instructions to facilitate the issuance of visas to Ukrainian nationals.⁴² It is unclear how this procedure worked in practice.

The *Portugal for Ukraine*⁴³ website contains information on leaving Ukraine. Accordingly, persons not holding a biometric passport, must contact a Portuguese Embassy in order to be issued a safe conduct to travel. The portal also directs people in need of transportation to fill in a form to facilitate regular and organised arrivals. It is unclear which type of support was/is provided to those filling it. Information on

³⁷ See, for instance: Justiça.Gov.Pt, *Reception and Integration of Ukrainian Citizens in Portugal*, available at: <https://bit.ly/3l8sFX3>.

³⁸ 23.480 Men, 33.119 Women; 13.961 Children, of which 752 unaccompanied.

³⁹ Out of which, 645 were Russian nationals.

⁴⁰ Article 10(3) Temporary Protection Act.

⁴¹ Article 10(4) Temporary Protection Act.

⁴² Rádio Renascença, *Costa deu instruções para concessão de vistos imediatos para cidadãos ucranianos*, 25 February 2022, available (in Portuguese) at: <https://bit.ly/3JFv5GU>.

⁴³ *Portugal for Ukraine*: <https://bit.ly/3RwtZ27>.

leaving Ukraine was also provided by the Portuguese authorities through the Ministry of Foreign Affairs webpage.⁴⁴

According to SEF, the number of people fleeing Ukraine refused entry at the border is not available.

2. Freedom of movement

The law does not provide for any restriction to the internal freedom of movement of persons entitled to and beneficiaries of temporary protection, and CPR is not aware of the application of any such restrictions in practice. CPR is also not aware of restrictions on the ability of persons entitled to and beneficiaries of international protection to move towards other EU countries.

The Temporary Protection Act regulates the transfer of residence of beneficiaries of temporary protection between EU Member States, broadly in line with article 26 of the Temporary Protection Directive.⁴⁵ Nevertheless, SEF informed that there is no procedure in practice for such purpose.

Data on de-registrations and onward relocations of beneficiaries to other EU Member States is not available, according to SEF. According to the same source, a total of 1.531 statuses were cancelled in 2022 (no information on the grounds).

3. Registration under temporary protection

The Resolution of the Council of Ministers approved on 1 March 2022, established that *applications* for temporary protection could be made in person or digitally, inside or outside Portuguese territory.⁴⁶ While according to the information gathered by CPR in early March 2022 the online registration platform⁴⁷ was not yet available, it became operational soon afterwards.⁴⁸

Registration, both online and in-person, is performed by the Immigration and Borders Service (SEF). According to the information provided by SEF, temporary protection cases are processed by a total of 12 staff members of its regional directorates.

Only persons over 18 years old can fully complete their registration online. For security reasons, the registration of children requires an in-person stage to be completed at SEF's offices.⁴⁹

While according to the legal framework registration can be performed before entry into national territory, CPR received reports that the online platform requires individuals to insert a date of arrival prior to registration. Nevertheless, SEF confirmed that it is possible to register from abroad.

The law does not establish any time limits for registration, and CPR has no indication that such limitations exist in practice.

The law does not clearly establish how to prove eligibility for temporary protection. According to the available information, any document proving eligibility (such as a passport or ID) must be presented. The procedure adopted by the authorities regarding undocumented persons is unclear (according to SEF, any kind of proof is accepted).

Registered persons are issued a *Certificate of preliminary registration on the temporary protection application platform* (Declaração comprovativa de registo prévio na Plataforma de pedido de protecção temporária), proving that their *application* for temporary protection has been recorded. The document

⁴⁴ Available at: <https://bit.ly/3HW2yLC>.

⁴⁵ Article 26 Temporary Protection Act.

⁴⁶ Resolution of the Council of Ministers no.29-A/2022, of 1 March 2022, last amended by Resolution of the Council of Ministers no.135/2022, of 28 December 2022, par.7, available at: <https://bit.ly/3HWIUjU>.

⁴⁷ On 18 March 2022, ACM and SEF organised a webinar to civil society and community-based organisations to provide information on the use of the online platform.

⁴⁸ Available at: <https://bit.ly/3HVHTYe>.

⁴⁹ See, for instance: Portugal for Ukraine, *Online temporary protection request – SEF – Borders and Immigration Service*, available at: <https://bit.ly/3X2hwEp>.

bears no reference to the rights attached to it or to its validity. Beneficiaries of temporary protection are subsequently issued a certificate of temporary protection by SEF (*certificado de concessão de autorização de residência ao abrigo do regime de proteção temporária*, See [Content of Temporary Protection](#)). The Temporary Protection Act only provides for a right to appeal in case of exclusion or of refusal of a family reunification request.⁵⁰

While any decision issued by national administrative authorities in practice can be challenged according to the general administrative rules, SEF confirmed that persons whose registration for temporary protection is refused are not issued a written decision, nor informed of the right to appeal on a systematic basis.

4. Legal assistance

The Temporary Protection Act does not contain provisions on access to legal assistance and legal aid by persons entitled to temporary protection.

According to CPR's experience, there was no widespread awareness of the advantages of **legal assistance** within the context of temporary protection eligibility, a fact that is likely related to the features of the regime. CPR provides legal information on access to temporary protection on a needs-basis. Furthermore, upon request, the organisation assists beneficiaries of temporary protection with regard to integration-related matters, such as the rights attached to their status, and access of children born in Portugal to Portuguese nationality.

General provisions on access to **legal aid**, establish that foreigners and stateless persons are entitled to free legal aid if they have a valid residence permit (in an EU Member State), and prove not to hold sufficient income.⁵¹ Foreigners not holding a residence permit are entitled to free legal aid if there is reciprocity in the legislation of their countries of nationality.⁵²

The Immigration Act also provides for the right to free legal aid to foreigners not admitted into national territory,⁵³ to victims of human trafficking/actions to facilitate illegal immigration,⁵⁴ to long term residents with a judicial expulsion decision,⁵⁵ and to persons intending to judicially challenge a coercive removal decision.⁵⁶

In February 2022, the Lawyers' Bar announced the creation of lists of voluntary lawyers available to provide free legal assistance to displaced Ukrainians.⁵⁷

According to the information provided by CSTAF, no appeals were filed in the Administrative Courts by Ukrainian applicants for temporary protection. A search of the publicly available jurisprudence of TCA South, TCA North and STA for temporary protection and Ukraine did not provide relevant results.

5. Information provision and access to NGOs

According to the Temporary Protection Act, beneficiaries of temporary protection must be provided a document stating the rights and duties attached to their status. Such document is to be written in a language they understand.⁵⁸ The Temporary Protection Act does not contain further provisions on access to information and to NGOs.

⁵⁰ Article 28 Temporary Protection Act.

⁵¹ Article 7(1) Access to Law and to Courts Act, available at: <https://bit.ly/3TsIFjB>.

⁵² Ibid, article 7(2).

⁵³ Article 40(2) Immigration Act, available at: <https://bit.ly/3JJjVjI>.

⁵⁴ Ibid, article 112(4).

⁵⁵ Ibid, article 136(4).

⁵⁶ Ibid, article 150(3).

⁵⁷ Ordem dos Advogados, *Apoio aos Cidadãos Ucrrianos | Lista de Advogados Voluntários*, 28 February 2022, available at: <https://bit.ly/3LppmWj>.

⁵⁸ Article 11 Temporary Protection Act.

Within the context of displacement from Ukraine, the national authorities launched a website, available in Portuguese, English and Ukrainian, containing information on eligibility for temporary protection and relevant procedures, as well as the rights attached to the status.⁵⁹

The High Commissioner for Migration (*Alto Comissariado para as Migrações*, ACM) created a specific email address to provide information related to displacement from Ukraine.⁶⁰ ACM also listed a number of resources to persons displaced from Ukraine in its website.⁶¹

Following the beginning of the war in Ukraine, a vast mobilisation for support was observed in Portugal, both within civil society, municipalities and other groups, providing varied assistance. According to the information provided by UNHCR, the entity and IOM organised information sessions to municipalities.

D. Guarantees for vulnerable groups

While the Temporary Protection Act, explicitly refers to the need to provide medical and other assistance to beneficiaries of temporary protection with special needs, such as unaccompanied children, victims of torture, violations or other serious forms of moral, physical or sexual violence,⁶² it does not provide for a mechanism for the identification of specific needs emerging from vulnerabilities.

As mentioned in [Asylum Procedure: Guarantees for vulnerable groups](#), such a mechanism is also not in place within the asylum system. According to the available information, there was also no mechanism in place in practice to identify and address such needs within the context of temporary protection.

With regards to particularly vulnerable groups, the Temporary Protection Act only refers to specific measures to adopt regarding **unaccompanied children**.⁶³ Accordingly, unaccompanied children:

- ❖ Must be provided with the necessary legal representation;
- ❖ Must be accommodated with adult family members, in foster families, in specialised reception centres or other appropriate locations, or with the person who took care of them during flight for the duration of the temporary protection.

While this provision is broadly in line with article 16 of the TPD, it failed to transpose into national law the last paragraph of the Directive's provision. As such, it does not refer to the agreement of the adult(s) concerned, and to the need to take into account the child's opinions, considering their age and development.

For security reasons, the registration of children must be completed at SEF's offices. This is done in order to perform security checks and to verify parental responsibilities.⁶⁴

An email address and telephone line were created for the identification of unaccompanied children and of availability for reception and transportation.

The government also established a multidisciplinary group to monitor the protection of unaccompanied children reaching Portugal within this context (ChildCareUKR). The group is composed by representatives of the Ministry of Labour, Solidarity and Social Security, Ministry of Justice, SEF and ACM.⁶⁵ According

⁵⁹ *Portugal for Ukraine* website, available at: <https://bit.ly/425MsYa>.

⁶⁰ sosucrania@acm.gov.pt

⁶¹ Alto Comissariado para as Migrações, *SOS Ucrânia*, available at: <https://bit.ly/3l3xMI9>.

⁶² Article 15(5) Temporary Protection Act.

⁶³ Article 18 Temporary Protection Act.

⁶⁴ See, for instance: Portugal for Ukraine, *Online temporary protection request – SEF – Borders and Immigration Service*, available at: <https://bit.ly/3X2hwEp>.

⁶⁵ Portugal for Ukraine, *Registering and protecting displaced Ukrainian children*, available at: <https://bit.ly/3l7YAa3>.

to the information provided by SEF, this group aims to facilitate communication between relevant state services and entities, and has allowed to determine more appropriate and efficient responses for integration. SEF has informed that this group meets regularly, and shares digital platform that facilitates communication between services and persons in need of specific assistance.

According to the information provided by SEF, a total of 752 applicants for temporary protection were identified as vulnerable, all of whom unaccompanied children.

A specific guide on prevention of trafficking in human beings has been produced and is available in Portuguese, English and Ukrainian.⁶⁶

⁶⁶ Comissão para a Cidadania e a Igualdade de Género, *Know the signs for your safety and protection*, available at: <https://bit.ly/3Y14591>.

Content of Temporary Protection

A. Status and residence

1. Residence permit

Indicators: Residence permit

- | | |
|--|--------|
| 1. What is the duration of residence permits granted to beneficiaries of temporary protection? | 1 year |
| 2. How many residence permits ⁶⁷ were issued to beneficiaries from the activation of the Temporary Protection Directive until 31 December 2022? | 47,782 |

Beneficiaries of temporary protection are entitled to a temporary protection residence permit to be issued free of charge.⁶⁸ According to the law, such temporary residence permits must be issued in the EU uniform format for residence permits.⁶⁹ The temporary protection residence permit is valid for one year, and can be renewed for the same period of time.⁷⁰

According to the publicly available information, following registration for temporary protection, SEF performs the necessary checks, and shares the individual's data with the ISS, health and tax services so that the corresponding user numbers are issued. Beneficiaries of temporary protection are then issued a certificate of temporary protection by SEF (*certificado de concessão de autorização de residência ao abrigo do regime de proteção temporária*). Following the collection of biometric data, the residence permit (card) should be issued.⁷¹

Despite this information, according to CPR's experience beneficiaries of temporary protection have not been issued the residence permit (card), at least on a systematic basis. SEF confirmed that this is the case and that the non-issuance of residence permits was determined by the Ministry of Home Affairs.⁷²

This is not only a doubtful practice, but may also bear adverse consequences for beneficiaries of international protection.

Notably, in the course of 2022, CPR received reports according to which SEF and the Institute of Registries and Notary (*Instituto de Registos e Notariado*, IRN) deemed the certificate of temporary protection as insufficient to prove legal residence of parents for the purposes of children born in Portugal to acquire Portuguese nationality at birth, as they are supposed to according to the Nationality Act (see: [AIDA Country Report Content of Protection – Naturalisation](#)).

Furthermore, the certificate is not included in the List of Residence Permits issued by Member States published by the European Commission,⁷³ which may lead to issues regarding the recognition of the document across Member States and the crossing of external borders.

According to SEF, a total of 47.782 certificates of temporary protection were issued in 2022. Data on withdrawal is not available.

According to the information provided by the authorities, access to the full array of rights attached to temporary protection only occurs following the issuance of the certificate of temporary protection by SEF.

⁶⁷ See infra.

⁶⁸ Article 10(1) and (4) Temporary Protection Act.

⁶⁹ Ministerial Order no.1432/2008, of 10 December, amended by Ministerial Order no.105-A/2022, of 1 March 2022.

⁷⁰ See, for instance: Justiça.Gov.Pt, *Acolhimento e integração de cidadãos ucranianos em Portugal*, available at: <https://bit.ly/3k9b7cC>.

⁷¹ Justiça.Gov.Pt, *Acolhimento e integração de cidadãos ucranianos em Portugal*, available at: <https://bit.ly/3k9b7cC>.

⁷² It was not possible to request further information on this aspect to the Ministry of Home Affairs before the publication of this report.

⁷³ Available at: <https://bit.ly/3JGfqXj>.

ISS informed, however, that those waiting may have their socioeconomic situation assessed and receive occasional financial support.

According to the information provided by SEF, there is no information on how long does it take on average from the moment the person registers in the platform, until they are effectively registered as beneficiaries of international protection. SEF further informed that Ukrainian nationals' registrations are automatically accepted, while registrations by third country nationals/stateless persons require a verification.

2. Access to asylum

Article 3 of the Temporary Protection Act explicitly states that the application of the temporary protection regime is without prejudice to the recognition of refugee status according to the Refugee Convention.⁷⁴ Access to the asylum procedure is specifically addressed in articles 19-21 of the Temporary Protection Act.

Beneficiaries of temporary protection can apply for asylum.⁷⁵ If the analysis of the asylum application is not concluded before the end of the temporary protection, it must be completed afterwards.⁷⁶ The law further determines that beneficiaries of temporary protection remain as such until their asylum application is accepted, and that the refusal of such application does not affect access to or continuation of temporary protection.⁷⁷

In practice, according to the information available to CPR, the number of asylum applications filled by Ukrainian citizens since the activation of the temporary protection is residual. It is unclear whether this is due to lack of interest/need, lack of information or other obstacles in accessing asylum.

The information available to CPR also indicates that at least a significant number of asylum applications filed by Ukrainians after 24 February 2022 but before the activation of the temporary protection regime were, according to SEF, "transposed to temporary protection". It is unclear if this amounts to a withdrawal of the asylum applications by the persons concerned, and the content of information provided in such cases (namely regarding the possible co-existence of asylum procedures and temporary protection).

SEF stated that Ukrainian nationals may apply to both regimes. However, the entity also confirmed that persons registering/registered for temporary protection are not systematically informed of their right to apply for international protection. According to SEF, in the course of 2022, 9 Ukrainian nations decided to apply for international protection instead of temporary protection in the course of 2022. Furthermore, SEF stated that the national authorities did not suspend the analysis of asylum applications made by Ukrainian nationals.

B. Family reunification

The Temporary Protection Act establishes a specific family reunification regime for persons whose separation was connected to the massive influx of persons in need of protection. Within this context, the following persons are deemed as family members:⁷⁸

- ❖ Spouse;
- ❖ Unmarried children under 18 years old (of the beneficiary of temporary protection or of their spouse);
- ❖ Other close relatives sharing a household, that were fully or significantly dependent on the beneficiary when the facts leading to the massive influx occurred.

⁷⁴ Article 3 Temporary Protection Act.

⁷⁵ Article 19(1) Temporary Protection Act.

⁷⁶ Article 19(2) Temporary Protection Act.

⁷⁷ Article 21 Temporary Protection Act.

⁷⁸ Article 17(1) Temporary Protection Act.

Spouses and unmarried children who are beneficiaries of temporary protection in another EU Member State are to be reunified, with due regard to their wishes.⁷⁹ If such family members are not yet in EU territory, they must be reunified if the family members are in need of protection.⁸⁰

Reunification of other close relatives listed in the law may occur, following an individual analysis of the challenges that may arise due to the separation.⁸¹

Decisions on family reunification under this regime are adopted by the Minister of Home Affairs, based on a proposal of the Inter-ministerial Commission (see: [General](#)).⁸² Refusals may be appealed before the administrative courts.⁸³

Family members are issued with temporary protection residence permits.⁸⁴

C. Movement and mobility

The law does not provide for any restriction to the internal freedom of movement of persons entitled to and beneficiaries of temporary protection, and CPR is not aware of the application of any such restrictions in practice. CPR is also not aware of restrictions on the ability of persons entitled to and beneficiaries of international protection to move towards other EU countries.

Nevertheless, as mentioned in [Residence Permit](#), beneficiaries of temporary protection are not issued an actual residence permit (card), and the certificate of temporary protection issued systematically by the Portuguese authorities is not included in the List of Residence Permits issued by Member States published by the European Commission,⁸⁵ which may lead to issues regarding the recognition of the document across Member States and the crossing of external borders.

D. Housing

Indicators: Housing

- | | |
|---|----------------|
| 1. For how long are temporary protection beneficiaries entitled to stay in reception centres? | Not applicable |
| 2. Number of beneficiaries staying in reception centres as of December 2022: | Not available |
| 3. Number of beneficiaries staying in private accommodation as of December 2022: | Not available |

According to the Temporary Protection Act, adequate housing must be provided to beneficiaries of temporary protection.⁸⁶ The Temporary Protection Act does not provide further elements on needs assessment or on what constitutes *adequate* housing, nor allocates such competency.

Specific legislative measures were enacted in order to facilitate access to the national programme on urgent housing by beneficiaries of temporary protection (e.g., simplification of bureaucratic requirements, and exemption of verification of availability of financial resources for eligibility for assistance).⁸⁷

⁷⁹ Article 17(2) Temporary Protection Act.

⁸⁰ Article 17(3) Temporary Protection Act.

⁸¹ Article 17(4) Temporary Protection Act.

⁸² Article 17(6) Temporary Protection Act.

⁸³ Article 28 Temporary Protection Act.

⁸⁴ Article 17(7) Temporary Protection Act.

⁸⁵ Available at: <https://bit.ly/3JGfqXj>.

⁸⁶ Article 15(1) Temporary Protection Act.

⁸⁷ Article 5 Decree-Law no.24-B/2022, of 11 March 2022, available at: <https://bit.ly/3la6RL1>. See also Decree-Law no.29/2018, of 4 May 2018, available at: <https://bit.ly/3ZCQky5>.

Beneficiaries of this support receive a financial allowance for housing expenses. The support has a duration of 18 months and can be extended up to 36 months.⁸⁸

According to the information available at the *Portugal for Ukraine* portal, assistance can be requested either online, to the relevant municipality or to the High Commissioner for Migration (ACM).⁸⁹ According to the same source, in order to benefit from this support, the following documents must be presented:⁹⁰

- ❖ Identification of the family/declaration of temporary protection;
- ❖ Lease contract and building registration or identification of the accommodation facility and invoice.

While it is unclear whether these measures resulted in easier access in practice, a newspaper article from August 2022 reported challenges for beneficiaries of temporary protection in accessing the housing support programme. According to the article, while, by the end of July 2022, 95 municipalities had joined the programme, there were no figures concerning the number of beneficiaries of temporary protection covered.⁹¹

According to ISS, the entity structures a network of collective accommodation facilities to assist those in need (with 276 places by the end of the year). This is a temporary response, applied until an intervention plan is designed. According to the same source, in order to access this response, beneficiaries of temporary protection must contact the district branches of ISS. ISS reported that, by the end of 2022, 266 persons were accommodated in such facilities.

Since the beginning of the response to the displacement from Ukraine, private citizens could flag availability to host displaced persons.⁹² It is unclear what kind of verification and supervision the public authorities conduct in the case of private offers of housing. By mid-2022, reports of abuse of Ukrainian citizens hosted by private citizens emerged in the press. According to the response provided by ACM in the case of one woman, the housing provision was not framed by an institutional agreement/referral.⁹³

According to UNHCR, the municipality of Cascais designed a specific reception model that included initial short-term accommodation in a reception centre, followed by accommodation in dedicated apartments and, finally, accommodation provided by volunteer families for a minimum of 6 months. According to the same source, the model included a vetting process of host families (including an interview and on-site visit to the accommodation), and subsequent provision of assistance by the municipality to those involved in the programme.

Throughout the year, a number of civil society organisations, such as CPR, were also involved in the provision of housing to beneficiaries of temporary protection.

⁸⁸ Article 14 Decree-Law no.29/2018, of 4 May 2018, available at: <https://bit.ly/3ZCQky5>; see also Portugal for Ukraine, *Alojamento*, available at: <https://bit.ly/3LmcNuP> (in Portuguese).

⁸⁹ Portugal for Ukraine, *FAQs*, available at: <https://bit.ly/3TtSb6h> (section on Housing); and Portugal for Ukraine, *Alojamento*, available at: <https://bit.ly/3LmcNuP> (in Portuguese).

⁹⁰ Portugal for Ukraine, *Alojamento*, available at: <https://bit.ly/3LmcNuP> (in Portuguese). Portugal for Ukraine, *Alojamento*, available at: <https://bit.ly/3LmcNuP> (in Portuguese).

⁹¹ Público, *Refugiados da Ucrânia esperam entrada em casas prometidas há meses por programa de apoio*, 1 August 2022, available at: <https://bit.ly/3mSukAZ> (in Portuguese; access to the article is restricted by a paywall).

⁹² The online form asks questions such as: name, telephone, email address, type of housing (room, apartment, house); is the housing shared; duration of the availability; location; further information (open answer without specific requirements).

⁹³ See, for instance: RTP, *Prova dos Factos. Ucraniana alvo de abusos na família que a acolheu em Portugal*, 6 May 2022, available at: <https://bit.ly/3YK6Db5>.

E. Employment and education

1. Access to the labour market

The Temporary Protection Act establishes that beneficiaries of temporary protection have the right to work.⁹⁴ The law further determines that access to work by beneficiaries of temporary protection cannot be to detriment to that of EU nationals and nationals from associated States and that of foreign residents receiving unemployment benefits.⁹⁵

In principle, the only restriction on employment enshrined in the law impacting beneficiaries of temporary protection consists in limiting access to certain categories of the public sector for all third-country nationals.⁹⁶ Furthermore, beneficiaries of temporary protection benefit from the same conditions of employment as nationals, including regarding salaries and working hours.⁹⁷ The law provides, however, for specific formalities in the case of employment contracts of third-country nationals such as the need for a written contract and its (online) registration with the Authority for Labour Conditions (*Autoridade para as Condições do Trabalho*, ACT).⁹⁸

Following the activation of the temporary protection regime, a number of legislative provisions were enacted regarding the recognition of qualifications and competencies of beneficiaries of temporary protection.⁹⁹ Accordingly, such requests have priority, and are exempted of a number of bureaucratic requirements such as legalisation of documents issued by foreign entities, certification of copies, and recognition of translations. Applicants are also exempted of the payment of fees.

A subsequent Decree-Law,¹⁰⁰ further regulated the recognition of professional qualifications of beneficiaries of temporary protection, establishing, inter alia, procedures for situations of insufficient documentation due to the war.¹⁰¹

Specific measures were also adopted regarding recognition and exchange of driving licences and professional driver's certifications.¹⁰²

According to the information available in the *Portugal for Ukraine* website, beneficiaries of temporary protection who wish to receive employment-related support, must register in the Employment and Vocational Training Institute (*Instituto do Emprego e Formação Profissional*, IEFP), either in person or by filling an online form.¹⁰³

Data on the number of beneficiaries of temporary protection registered in IEFP or employed by the end of the year was not available at the time of writing.

Registration in IEFP also enables beneficiaries of temporary protection to certified Portuguese courses.¹⁰⁴ Data on the number of beneficiaries of temporary protection that had access to such courses was not available at the time of writing.

⁹⁴ Article 14(1) Temporary Protection Act.

⁹⁵ Article 14(2) Temporary Protection Act. It is unclear if this limitation is being applied in practice and how.

⁹⁶ Article 15(2) Constitution and Article 17(1)(a) and (2) Act 35/2014.

⁹⁷ Article 4 Labour Code.

⁹⁸ Article 5 Labour Code.

⁹⁹ Article 6 Decree-Law no.24-B/2022, 11 March 2022, available at: <https://bit.ly/3la6RL1>.

¹⁰⁰ Decree-Law no.28-B/2022, of 25 March 2022, available at: <https://bit.ly/400F6mE>.

¹⁰¹ Ibid, article 4.

¹⁰² Article 4 Decree-Law no.24-B/2022, 11 March 2022, available at: <https://bit.ly/3la6RL1>.

¹⁰³ Portugal for Ukraine, FAQs, available at: <https://bit.ly/3UNnJVI>(section on Employment).

¹⁰⁴ Further information on identification of relevant courses and opportunities is available at: Portugal for Ukraine, FAQs, available at: <https://bit.ly/3Lnvv5t> (Learning Portuguese section).

2. Access to education

According to the Temporary Protection Act, child beneficiaries of temporary protection are entitled to access public education under the same conditions as nationals.¹⁰⁵

A Ministerial Order of the Ministry of Work, Solidarity and Social Security issued in May, established special measures for the integration of children displaced from Ukraine in **kindergarten** and other leisure facilities, determining, inter alia, that the regular capacity of facilities may be exceptionally extended to ensure integration, and that such children are entitled to attend kindergarten free of charge.¹⁰⁶

DGE also reported that informal settings to promote the integration of children not attending other national services are also being developed. The so-called *Learn, Play, Grow Groups* are aimed at children up to 4 years old, accompanied by a caregiver, and may be implemented by entities such as municipalities and civil society organisations with the support of DGE.¹⁰⁷

In March 2022, the Directorate General for Education (*Direção-Geral de Educação*, DGE), adopted a circular-letter clarifying a number of aspects related to the swift integration of children displaced from Ukraine in the **national education system**.¹⁰⁸ Notably, with regard to equivalences and school placement, it was determined that ensuring access and immediate integration is the priority, and that the rules established for asylum seekers are applicable. Additionally, the conversion tables of Ukrainian school system to the Portuguese school system apply. The circular-letter also reinforced that schools may adopt specific measures in order to support children whose first language is not Portuguese, also in line with what is established for applicants for international protection (see: [AIDA Country Report, Reception Conditions – Access to Education](#)).

DGE published guides on integration of Ukrainian children in pre-school education and in subsequent school levels.¹⁰⁹ With regards to integration in the school system, the guidance establishes, inter alia, that:

- ❖ Regarding students whose parents/legal representative choose to follow Ukrainian remote learning
 - No equivalences or certification is granted;
 - Students must be present in a Portuguese school during the online activities provided by Ukrainian schools;
 - Students must attend Portuguese non-native language classes, as defined by the relevant school;
 - Students are provided with the necessary resources such as IT equipment and work space;
 - The specifics of the implementation are defined by schools.
- ❖ Regarding students fully integrated in the Portuguese education system
 - As mentioned above, the rules established for access to education by asylum seeking children are applicable to this group;
 - Their activities may be complemented by resources provided by the Ukrainian National Online School.

The implementation of the specific measures related to Education is monitored by a group composed of different bodies of the Ministry for Education, ACM, and others.¹¹⁰

¹⁰⁵ Article 16 Temporary Protection Act.

¹⁰⁶ Ministerial Order no. 138/2022, of 8 April 2022, available at: <https://bit.ly/3Jiou34>.

¹⁰⁷ For more information, see: <https://bit.ly/41UnOZD>.

¹⁰⁸ DGE, *Ofício-Circular 10976/2022/DGE-DSDC-ECE*, 16 March 2022, available at: <https://bit.ly/3mlqxpw>.

¹⁰⁹ DGE, *Integração de crianças refugiadas na educação pré-escolar*, 15 March 2023 (guidance for pre-school integration), available at: <https://bit.ly/3ZOabua> (in Portuguese); DGE, *Orientações para o acolhimento, a integração e a inclusão de crianças e jovens ucranianos*, April 2023 (guidance for subsequent education levels), available at: <https://bit.ly/4067mV3>.

¹¹⁰ Portugal for Ukraine, *Educação*, available at: <https://bit.ly/3Fpa1kK> (in Portuguese).

DGE also reported that language resources on Portuguese language for non-native speakers were made available through the public radio and television.¹¹¹

At the time of writing, no evaluation of the adopted measures was publicly available.

With regard to higher education, Decree-Law no.24-B/2022, of 11 March 2022,¹¹² established that beneficiaries of temporary protection may request the application of the “student in an emergency situation for humanitarian reasons” status (see: XXX).¹¹³ Access to such status was clarified by Decree-Law no.28-A/2022, of 25 March,¹¹⁴ establishing inter alia, that:

- ❖ Requests may be presented at any time to the relevant higher education institutions;
- ❖ Students in this situation may require registration in a higher education institution/degree congeneric to the one previously attended (same academic level and equivalent training);
- ❖ The integration of student beneficiaries of temporary protection is not limited by *numerus clausus* regularly applicable, and may occur in all levels of higher education, including in the field of Medicine;
- ❖ If documentary evidence of the qualifications is not available, the higher education institutions may resort to alternative verification methods;¹¹⁵
- ❖ Student beneficiaries of temporary protection that were already enrolled in higher education may also request the “student in an emergency situation for humanitarian reasons” status.

The same Decree-Law also establishes that beneficiaries of temporary protection holding foreign certificates or diplomas that are not sufficient for recognition in Portugal must be ensured access to a higher education institution granting a degree in the same field, upon request, as well as the rules applicable to such procedures.¹¹⁶

The Directorate-General for Higher Education (*Direção-Geral do Ensino Superior*, DGES), and the national ERASMUS+ Agency, both published resources with information on access to higher education in Portugal, social support in higher education, and recognition of academic degrees and diplomas, both in Portuguese and Ukrainian.¹¹⁷

Requests for “student in an emergency situation for humanitarian reasons” status, must be filled with proof that the applicant is a beneficiary of temporary protection.¹¹⁸ Admission to higher education institutions may be granted with exemption of some of the regular admission requirements, such as knowledge of the teaching language, and specific academic qualifications.¹¹⁹

Students with this status may also request financial support to attend higher education, with exceptional conditions, such as a simpler process to determine eligibility, applying.¹²⁰

As mentioned in [Access to the Labour Market](#),¹²¹ requests for the recognition of qualifications of beneficiaries of temporary protection have priority, and are exempted of a number of bureaucratic requirements such as legalisation of documents issued by foreign entities, certification of copies, and recognition of translations. Applicants are also exempted of the payment of fees.

¹¹¹ RTP Ensina, *Português para Ucrânicos*, available at: <https://bit.ly/41we1sU>.

¹¹² Article 3.

¹¹³ Article 8-A Decree-Law no.36/2014, of 10 March 2014, added by Decree-Law no. 62/2018, of 6 August 2018, available at: <https://bit.ly/3FoqvcT>.

¹¹⁴ Article 2.

¹¹⁵ Such as interviews and tests while the national authorities finalize accession to the European Qualifications Passport for Refugees. See Agência Nacional ERASMUS+, *Nota Estudantes em situação de emergência humanitária*, p.2, available at: <https://bit.ly/3ZDYnL3>.

¹¹⁶ Article 3 Decree-Law no.28-A/2022, of 25 March 2022, available at: <https://bit.ly/3Fn4F9V>.

¹¹⁷ Available at: <https://bit.ly/3FnosFX> and <https://bit.ly/3ZDYnL3>, respectively.

¹¹⁸ Request for registration for temporary protection is not sufficient. See: Agência Nacional ERASMUS+, *Nota Estudantes em situação de emergência humanitária*, p.2, available at: <https://bit.ly/3ZDYnL3>.

¹¹⁹ Ibidem.

¹²⁰ Ibid, p.4.

¹²¹ Article 6 Decree-Law no.24-B/2022, 11 March 2022, available at: <https://bit.ly/3la6RL1>.

In June, it was reported in media outlets that Medical Schools were granting differentiated treatment to Ukrainian and non-Ukrainian beneficiaries of temporary protection. According to the reports, while Ukrainian beneficiaries were integrated in the institutions, non-Ukrainian beneficiaries were not given swift answers and the institutions claimed that the situation of those two groups was not similar, and that there were capacity limitations to consider. According to the same article, the ministry of Higher Education claimed that it did not consider that the legal framework allowed such a differential treatment.¹²²

At the time of writing, no evaluation of the adopted measures was publicly available.

According to DGES, until September 2022, a total of around 330 requests for recognition of academic degrees were filed by Ukrainian citizens, of which around 100 belonged to beneficiaries of temporary protection.¹²³

F. Social welfare

The Temporary Protection Act provides for the right of beneficiaries of temporary protection to access social welfare benefits and means of subsistence in the absence of personal resources.¹²⁴

The Council of Ministers determined that such benefits are to be granted to beneficiaries of temporary protection that do not have sufficient resources, and that beneficiaries of temporary protection must receive treatment equal to that granted to refugees in accessing non-contributory social welfare benefits.¹²⁵ In particular, beneficiaries of temporary protection with insufficient resources may access the Social Reinsertion Revenue (*Rendimento Social de Inserção*, RSI), and child-related allowances (see [AIDA Country Report, Content of Protection – Social Welfare](#)). Requests for such allowances must be filled in the Social Security Institute (*Instituto de Segurança Social*, ISS).

Additionally, an extraordinary support allowance for particularly vulnerable families displaced from Ukraine was created in March 2022.¹²⁶ According to the law, was meant to support families that are particularly exposed to the increase of food prices.¹²⁷ It consisted of a one-time allowance of 60€ per family unit, paid in April 2022.¹²⁸ It was automatically granted by ISS based on the information available to the entity.¹²⁹

Beneficiaries of temporary protection may also access support provided by a social worker, and may resort to the Social Emergency Hotline¹³⁰ in case of need.¹³¹

According to the information provided by ISS, by the beginning of December 2022, a total of 49.233 social security identification numbers (NISS) had been granted to beneficiaries of temporary protection (out of a total of 50.225 requests). ISS also reported that 20.455 beneficiaries had been approved for some measure of social welfare assistance (general system), with 19.255 already receiving them at the time. ISS further reported that, by the same date, 7.672 beneficiaries had been granted an extraordinary allowance for vulnerable families, and 13.481 beneficiaries had been granted an extraordinary allowance for persons whose income relied on social welfare allowances.

¹²² Público, *Há escolas de Medicina que só estão a aceitar alunos ucranianos e excluem outros refugiados*, 19 June 2022, available at: <https://bit.ly/3Tgboli> (in Portuguese; access to the article is restricted by a paywall).

¹²³ RTP Madeira, *Portugal já reconheceu qualificações académicas de 100 refugiados ucranianos*, 25 November 2022, available at: <https://bit.ly/42g2Fds>.

¹²⁴ Article 15(2) Temporary Protection Act

¹²⁵ Resolution of the Council of Ministers no.29-A/2022, of 1 March 2022, last amended by Resolution of the Council of Ministers no.135/2022, of 28 December 2022, par.12 and 13, available at: <https://bit.ly/3HWIUjU>.

¹²⁶ Articles 4-8 Decree-Law no.28-A/2022, of 25 March 2022, available at: <https://bit.ly/3Fn4F9V>.

¹²⁷ Ibid, article 4.

¹²⁸ Ibid, article 6.

¹²⁹ Ibid, article 7.

¹³⁰ A 24h/day line, reachable by dialling 144.

¹³¹ Portugal for Ukraine, *Apoio Social*, available at: <https://bit.ly/3TfrbXY> (in Portuguese).

G. Health care

The Temporary Protection Act provides for the right of beneficiaries of temporary protection to medical assistance, comprising emergency care and primary health care.¹³² It further determines the provision of assistance (medical and other) to beneficiaries of temporary protection with special needs such as unaccompanied children, victims of torture, violations or other forms of moral, physical or sexual violence.¹³³

The Resolution of the Council of Ministers concerning temporary protection determines that the grant of protection is communicated to the national health services *ex officio* by SEF, and a National Healthcare System number is automatically granted to each beneficiary.¹³⁴ According to the information publicly available, the issuance of the user number entitles beneficiaries of temporary protection to access all the services provided by the National Healthcare System.¹³⁵

In order to have a family doctor assigned, beneficiaries of temporary protection must then register in the health care unit of their area of residence.¹³⁶ According to the information provided in the Portugal for Ukraine website, a specific medical service for children coming from Ukraine was set up, with referrals made by phone. According to the same source, these appointments were supported by an interpreter, and allowed to perform the necessary referrals.¹³⁷

Regarding vaccination, in March 2022, the Directorate-General for Health (*Direção-Geral de Saúde*, DGS), published a technical note on vaccination of persons within the context of displacement from Ukraine. It reinforces the right of all persons present in Portugal to access vaccination in line with the National Plan (including Covid-19 vaccines), establishes technical criteria for administration of vaccines and defines priorities considering the epidemiologic situation in the country of origin.¹³⁸

¹³² Article 15(4) Temporary Protection Act.

¹³³ Article 15(5) Temporary Protection Act.

¹³⁴ Resolution of the Council of Ministers no.29-A/2022, of 1 March 2022, last amended by Resolution of the Council of Ministers no.135/2022, of 28 December 2022, par.8, available at: <https://bit.ly/3HWIUjU>.

¹³⁵ Portugal for Ukraine, *Saúde*, available at: <https://bit.ly/3LqyNFc> (in Portuguese). It is worth mentioning that access to the Portuguese health care system is mainly free.

¹³⁶ Ibidem.

¹³⁷ Ibidem.

¹³⁸ DGS, *Norma n.º 003/2022*, 19 March 2022, available at: <https://bit.ly/3YIBdlq> (in Portuguese).